



*Maine Organic Farmers
and Gardeners Association
Common Ground Country Fair*

National Organic Standards Board
c/o Valerie Frances
United States Department of Agriculture
Room 4008 - South Building
1400 Independence Avenue, SW
Washington, DC 20250-0001

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CC: Via E-mail: NOSB.Livestock@usda.gov

Comments on Aquaculture Standards

Hi Valerie,

I realize that these comments are late but I hope that you are still able to forward them to the NOSB Livestock Committee for their consideration when they develop aquaculture standards. Although I submitted comments when asked for to the Task Force Interim Report in April, I feel I should stress the comments I had that deal directly with the issues raised by the Livestock committee in their most recent invitation (September 8, 2006).

In a recent Ph.D. thesis done by Linda Berlin at Tufts University she notes environmental protection as one of the reasons consumers buy organic food. The NOP has done a commendable job of addressing this historic consumer motivation in their regulations of terrestrial organic agriculture. I must stress that I hope the NOSB Livestock Committee writes proposed aquaculture regulations that continue to support this expectation of the consumer, as reflected in the report of the first NOSB Aquatic Animal Task Force of which I was a member.

Aquaculture has a number of environmental risks associated with it that need to be addressed in standards. I believe that the Livestock Committee is well aware of these. What I want to stress is that the aquatic and marine environment needs to be protected by the NOSB proposed regulations at least to the level that the NOP chose to use in their Final Rule regulating organic production in terrestrial systems. The NOP chose to

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use language such as that in Section 205.203 of the Rule that reads, " ...the producer must manage plant and animal materialsin a manner that does not contribute to contamination of crops, soil or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances." This is very strong language and is what consumers expect. The words "does not contribute" could not be stronger. The environmental risks posed by aquaculture's use of large amounts of feed is enormous, especially in net pen systems and is directly equivalent to risks addressed in the NOP language I quote above.

The issue that I feel most strongly about with respect to meeting consumer expectations is that of the use of fish meal as feed. The first NOSB Aquatic Animal Task Force concluded that wild caught fish do not meet the rigors of organic certification, and so fish meal made from wild caught fish should not be labeled organic. Since organic livestock must be fed organic feed, fish meal should not be supplying a significant portion of the certified organic livestock's nutrition. The suggestion of 12% is way beyond what should be coming from a permitted natural supplement or additive. This much fish meal is contrary to OFPA, and is contrary to consumer expectation of organic standards protecting the environment. As pointed out in numerous other comments you have received, fish meal production is devastating to wild fish populations. Contrary to popular belief, fish meal is not the recycling of a waste product of fish processing, but most is actually the result of intentional fish catch. As pointed out in the excellent publication from Environmental Defense called "Murky Waters: Environmental Effects of Aquaculture in the United States (1997), the harvesting of wild fish to feed aquaculture is wiping out numerous species of small pelagic fishes. Consumers certainly do not expect anything labeled organic to have a hand in that.

Thank you for the opportunity to comment again. And, for a more detailed discussion, please see my comments submitted in April, 2006 to the Aquaculture Working Group Interim Final Report.

Sincerely,

Eric Sideman
Director of Technical Services